

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2004-6-G

IN THE MATTER OF:)	
)	
South Carolina Pipeline Corporation)	INTERROGATORIES OF
Annual Review of the Purchased Gas)	THE CONSUMER ADVOCATE
Adjustments and Gas Purchasing Policies)	(Set No. 2)
_____)	

Pursuant to S.C. Code Ann. § 37-6-601 et. seq., (1989 and Supp. 2003), and 26 S.C. Code Ann. Regs. 103-851 (1976 and Supp. 2003), this party of record and Intervenor, Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, hereby serves these Interrogatories upon South Carolina Pipeline Corporation (SCPC or Company) in Docket No. 2004-6-G and files the original and one (1) copy with the Honorable Bruce F. Duke, Executive Director of the South Carolina Public Service Commission.

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format as requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the interrogatory response in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

- F. That all exhibits be reduced to 8½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- J. That the Company provide the Consumer Advocate two copies of the responses to these Interrogatories as soon as possible, but no later than **April 11, 2004** and provide one copy to:

Glenn A. Watkins
Technical Associates, Inc.
1051 East Cary Street Suite 601
Richmond, VA 23219

- K. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
 - L. These Interrogatories shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- 2-1. With respect to interruptions and curtailments of Pipeline's sales and transportation customers, provide the following for each curtailment during the period of October 1, 2001 through the present date:
- (a) date(s);
 - (b) customer I.D. (Codes may be used to protect identity);
 - (c) duration of curtailment (hrs);
 - (d) estimated amount of gas curtailed (total Dth);
 - (e) type of customer; i.e., ISPR, interruptible transportation, etc.;
 - (f) reason for curtailment; and,
 - (g) customer contract maximum daily quantity.

Please provide in hardcopy as well as in electronic media (ASCII format or Microsoft Excel).

- 2-2. Provide the dates and five highest daily sendouts (Dth) for each of the last five years (excluding Urquhart requirements).
- 2-3. Provide design day demand (total system and by rate schedule if available) for each of the last five years excluding Urquhart requirements.
- 2-4. Provide the following for each of the last five heating seasons (years):
- (a) reserved or contracted upstream pipeline capacity;
 - (b) contracted storage capacity;
 - (c) owned storage capacity;
 - (d) contracted LNG capacity;
 - (e) owned LNG capacity;
 - (f) contracted propane-air capacity;
 - (g) owned propane air capacity; and,
 - (h) total firm capacity (Dth/day);
- 2-5. For each month from January 2003 through the present date, provide the following:
- (a) firm resale billed commodity cost of gas excluding Risk Management Price risk adjustment per Dth;
 - (b) firm billed resale billed Risk Management Price risk adjustment per Dth;
 - (c) total firm resale billed commodity cost of gas per Dth;
 - (d) total firm resale commodity cost of gas (total dollars) excluding Risk Management Price Risk Adjusted;
 - (e) total firm resale (total dollars) Risk Management Price Risk Adjustment;
 - (f) total firm resale energy input (Dth); and,
 - (g) total firm Risk Management Price Risk Adjustment energy input (Dth).

Please provide in hardcopy as well as in electronic media (ASCII format or Microsoft Excel).

2-6. For each month from January 2003 through the present date, provide the following:

- (a) Interruptible sales (ISPR) billed commodity cost of gas per Dth per customer (codes may be used to protect identity), and aggregate;
- (b) Interruptible sales (ISPR) actual billed margin per Dth per customer (codes may be used to protect identity), and aggregate;
- (c) Interruptible sales (ISPR) alternative fuel cost (in years of Dth) per customer (codes may be used to protect identity);
- (d) Interruptible sales (ISPR) billed Dth per customer (codes may be used to protect identity);
- (e) Interruptible sales (ISPR) total billed commodity cost of gas (total dollars);
- (f) Interruptible sales (ISPR) total billed margin (total dollars); and,
- (g) Interruptible sales (ISPR) total billed Dth.

Note: Similar data as requested in Consumer Advocate Interrogatory No. 1-7, however margins and gas costs were combined in the Company's response.

2-7. Provide the maximum approved margin per Dth, and Commission order number with respect to Interruptible sales (ISPR).

2-8. For each month from January, 2003 through the present date provide the following:

- (a) Firm sales billed Demand cost of gas per Dth;
- (b) Interruptible sales (ISPR) billed demand cost of gas per Dth;
- (c) Total firm sales billed demand cost of gas total dollars; and,
- (d) Total interruptible sales (ISPR) billed demand cost of gas (total dollars).

2-9. Please reconcile the total ISPR billed Dths calculated from response to Consumer Advocate Interrogatory No. 1-8 (e.g., January 2003 = 2,618,046 Dth) with the ISPR Dths provided in response to Consumer Advocate Interrogatory No. 1-3, as well as the amounts reported to the Commission in the Monthly Financial and Operating reports (see response to Consumer Advocate Interrogatory No. 1-2(b)).

2-10. Please reconcile the firm monthly billed Dth calculated from response to Consumer Advocate Interrogatory No. 1-8 with Actual Energy Input provided in response to Consumer Advocate Interrogatory No. 1-3 and the Monthly financial and operating reports provided to the Commission [Consumer Advocate Interrogatory No. 1-2(b)].

2-11. For each commodity purchase provided in Attachment 1.5.8 of response to PSC Staff Data Request 1-5 (monthly commodity purchases 1/03 - 12/03 by type of purchase) provide the following:

- (a) identify contract or spot market purchase (or combination);
- (b) minimum monthly purchase requirement;
- (c) maximum monthly purchase entitlement;
- (d) vendor(s);
- (e) contract I.D. number(s); and,
- (f) details underlying each aggregate amount (by vendor).

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

By: _____
S.C. Department of Consumer Affairs
3600 Forest Drive
Post Office Box 5757
Columbia, S.C. 29250-5757
(803) 734-4189

April 30, 2004

CERTIFICATE OF SERVICE

This is to certify that I, Elliott F. Elam, Jr., have served this day the foregoing **Interrogatories of the Consumer Advocate (Set No. 2)** upon the persons named below, at the addresses set forth, by deposit in the United States mail, postage prepaid.

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P.O. Box 8416
Columbia, SC 29202-8416

Garrett A. Stone, Esquire
Brickfield, Burchette, Ritts & Stone, PC
1025 Thomas Jefferson St. NW 8th Floor
Washington, DC 20007

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

April 30, 2004
Columbia, South Carolina